

Colorado Department of Health

Review and Comment

Final Phase I RFI/RI Workplan, OU 3 - Offsite Areas
December, 1991

General Comments:

1) The only major issue that was not addressed in this final version of the OU 3 RFI/RI Workplan is the analysis for metals in the surficial soils. The Division, based on the latest information compiled in the Dose Reconstruction Survey (the CDH/ChemRisk initiative), has decided that the possibility of measurable concentrations of the metal compounds of concern in the offsite surficial soils is very remote. Therefore, we will not press our demand that the soil analysis include metals. However, since DOE has adamantly refused to add metals to the analytical suite for soils, DOE must recognize that at any future time when information becomes available that indicates metals may have contaminated offsite soils, DOE will be liable to investigate and characterize this contamination, no matter what the cost at that time will be. In light of this cost factor, it still seems prudent to us that DOE add that analysis to this investigation.

Specific Comments:

Section 1.3.4.2: The values stated in this section for hydraulic conductivity are not representative of values the Division has seen for the geologic units mentioned. In fact, hydraulic conductivities that we have seen for the plant-site indicate that the actual value is at least two orders of magnitude higher.

Figure 2-8: The only data point on this map that is germane to the major plutonium and americium contamination offsite is data point 1-360. However, there is no mean and standard deviation listed for this data point. Please include this information or state why it is unavailable.